



# ***Environmental & Safety Compliance Corp.***

December 3, 1997

Mr. Eric Wilson  
On-Scene Coordinator  
U. S. Environmental Protection Agency  
Region II, EERRD/RAB (MS-211)  
2890 Woodbridge Avenue  
Edison, New Jersey 08837

Re: Drum Disposal (Site Stabilization Operations)  
Cornell-Dubilier Electronics Site  
333 Hamilton Boulevard  
South Plainfield, New Jersey

Dear Mr. Wilson:

In accordance with the Drum Sampling, Analysis and Disposal Plan for the above referenced site, Environmental & Safety Compliance Corporation submitted a Notification of Regulated Waste Activity Application (EPA Form 8700-12) to the offices of Mr. Jack Hoyt of the EPA for approval (Tel. 212-637-4106). Based on our conversations with personnel of this office, we were verbally notified that the designated EPA Generator's Identification Number for the subject property is NJR000022152 (please refer to for 8700-12 enclosed).

Additionally, in accordance with this plan, the chosen final disposal facility for the wastes must be named for pre-approval. The following disposal facilities may be chosen by DSC of Newark Enterprises Inc. for the disposal of drums numbered 1,2, & 4 (Comp #2) and drums 6, 7, & 8 (Comp #5):

Pollution Control Industries      **OR**  
4343 Kennedy Avenue  
East Chicago, IN 46312  
Contact: Mr. Mike Rotella 201-426-8458  
EPA ID # IND000646943

S & W Waste, Inc.  
115 Jacobus Avenue  
South Kearny, N J 07032  
Contact: Mr. Steve Kisko 201-344-4004  
EPA ID #NJD991291105

Copies of the waste profile sheets for these wastes have been completed and enclosed for your review.

With regard to the analytical data submitted to your offices for review, two notes of concern were relayed to my attention, specifically:

- Composite Sample Number 3 (Comp #3) PCB Results  
Comp. #3 was obtained from materials located in the drums designated Numbers 3 and 5. During the Site Stabilization Operations, these drums were found to be leaking onto the

underlying soil in the New Brunswick Roofing Area. As part of the drum stabilization operations, underlying soils found to be visually contaminated with the leaking drum contents were placed into the over pack with the corresponding drum, specifically, Numbers 3 & 5. It is suspected that the concentrations of Aroclor 1254 were introduced into the drum from this clean up action and not constituents of the drum contents. Based on the sub-sampling performed, a 2 part in 5 composite was obtained of the contaminated soil. Therefore, based on this hypothesis, the source of the PCB concentration is in excess of 50 ppm, and drums number 3 & 5 will be disposed of as TSCA regulated waste.

- Composite Sample Number 4 (Comp #4) PCB Results

Based on our review of Comp #4, it was determined that a Dilution Factor of 100.0 was employed. Therefore, reporting values for PCB was found to be less than 110 ppm. Based on our conversations with Chemtech personnel, it was determined that this was employed due to physical nature of the material as they were unable to analytically test to preferred detection limits in its common state. It can only be suspected that the source of the PCB concentration, is in excess of 50 ppm. Therefore, drum number 9 will be disposed of as TSCA regulated waste.

Personal protective equipment and associated decon materials will be disposed of as TSCA regulated wastes due to the fact that source of contamination is suspected to be in excess of 50 ppm.

TSCA regulated wastes as described above will be disposed of at the following facility:

CWM Chemical Services Incorporated  
1550 Balmer Road  
P.O. Box 200  
Model City, New York 14107  
EPA ID # NYD049836679

Copies of the waste profile sheets for the TSCA regulated material has been enclosed for your review.

If there should be any questions regarding this transmittal, please do not hesitate to call.

Sincerely,



Joseph Lockwood  
President

cc. Ms. Lara Coraci

*E. & S. Compliance Corp.*  
*303 Prospect Avenue*

